

DATA PROCESSING AND RETENTION POLICY

We collect, store and process different types of personal information in the provision of legal services as necessary. Our data is backed up daily by our IT service provider and encrypted within a UK data centre. We reserve the right to disclose any of the information you provide to us where required to do so by law, or to comply with a regulatory obligation, or to assist in any investigation into alleged illegal or criminal conduct.

Type	Description
Identification data	Title, name, contact details to include your address, telephone numbers and email address. Your date of birth, gender, National Insurance number
Financial Data	Your bank details and financial position. Your financial history. Details of beneficial ownership of a company. Ongoing monitoring of your payments for our services.
Contractual Data	Information obtained during our engagement in the provision of legal services to you – including but not restricted to emails, letters, faxes and conversations.
Special Category Data	<p>The following are defined as special categories of personal information. We collect and use these types of information as necessary to provide legal services for the establishment, exercise or defence of legal claims:</p> <ul style="list-style-type: none"> - Health data - Sexual orientation and sex life data - Genetic or biometric data - Criminal convictions - Racial or ethnic origin - Political opinion, religious or philosophical beliefs

Processing your information:

What we use it for	Why we use it	The legitimate interests
<p>To provide legal services in the fulfilment of our contractual obligations.</p> <p>To provide you with advice and guidance about our services.</p>	<p>To fulfil our contractual obligations.</p> <p>For legal purposes.</p> <p>For legitimate interests.</p>	<p>To provide you with legal services.</p> <p>To exercise our rights under contract and provide you with our services.</p> <p>To maintain our records.</p>
To fulfil our obligations in terms of Anti Money Laundering, Terrorist Crime and other such obligations ensuring we obtain, verify and retain valid identification for you.	<p>Legal obligation.</p> <p>Legitimate interest.</p>	To allow the provision of legal services and the acceptance of your instructions that we act on your behalf.
To manage our business in an effective and efficient manner as a provider of legal services.	<p>To fulfil our contractual obligations.</p> <p>Legal obligation.</p> <p>Legitimate interest.</p>	<p>Efficient management of our responsibilities and the provision of legal services.</p> <p>To monitor and manage credit control and debt recovery.</p> <p>To prepare and monitor compliance.</p> <p>To manage complaints.</p>
Business development activities	Legitimate interest.	<p>To promote our business.</p> <p>To develop our services.</p> <p>To develop our relationship with you and others.</p> <p>To seek your consent if we need it.</p>

Where we may collect your information from:
Directly from you or from document provided by you or obtained in the course of our engagement with you.
From other solicitors or organisations, professional advisors and financial institutions.
Resources such as Companies House, the Registers of Scotland to include search agencies and intermediaries.
Court officials, adjudicators, arbiters, expert witnesses and others we engage (or have engaged us) in the provision of legal services to you.
Who we may share your information with:
Our Anti-Money Laundering service provider.
Other agents and service providers who we engage with in the provision of our services including solicitors, courts, counsel, officers of the court, sheriff officers, law accountants, forensic accountants, search agents and insurance brokers.
HMRC and Police Scotland or other such law enforcement or government agencies where it is necessary for the provision of our services to you or where we have a legal or regulatory obligation to do so.
Relevant regulators including but not restricted to the Information Commissioners Office, the Law Society of Scotland, The Scottish Legal Complaints Commission, Professional Insurance brokers or other agents acting on our instructions.
Other agents, professional advisors or bodies instructed on our behalf in any transaction, legal proceedings or matter in which we are engaged.
Other professional advisors engaged by you.
Public information resources such as Companies House, Registers of Scotland, the internet and social media sites.
Our service providers including our document storage and management platforms, our internet service and IT equipment provider.
How long do we retain your data for?
We will only retain your personal information for as long as necessary to fulfil the purposes for which we collect it, including the purpose of satisfying any legal, accounting or reporting requirements and in terms of our regulatory requirement. The Law Society of Scotland issue guidelines in this respect concerning the retention of client files and your personal information contained within them for a minimum period of ten years from the date the matter in which you instructed us completed.
Where you have instructed us to retain your Will, title deeds or other such testamentary document or Mandate we shall retain these in the interests of contractual obligation, legitimate interest and legal obligation for an indefinite period, until death of the testator/grantor or implement of the document.

Choosing not to give your personal information
We need to process your personal information to meet our legal obligations – for our own legislative obligations – and in furtherance of the legal services which we provide on your behalf in terms of our contract. If you fail to provide the data when requested, it may delay or prevent us fulfilling our obligations. This may mean we are unable to represent you.

Automated decisions
We do not solely rely on automated decisions or processing of information for the purposes of fulfilling our legal obligations.